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Attorney for plaintiff CYNTHIA JOHNSON

IN THE DISTRICT COURT OF THE UNITED STATES OF AMERICA
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CYNTHIA JOHNSON,
Plaintiff,
v.
DEPUTY PERSIANI; DEPUTY MATT CLARK;
JOHN DOE and RICHARD ROE, individually
and in their capacities as Santa Clara County
Deputy Sheriffs, the true names and exact numbers
of whom are unknown at this time; COUNTY OF
SANTA CLARA; DOES 3 to 100,
Defendants.

No. CV 11-06673 PSG

STIPULATION AND
~~PROPOSED~~ ORDER TO
CONTINUE TRIAL AND
RELATED DATES

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that having met and conferred that the jury selection and trial dates in this matter be amended as follows:

Designation of Opening Experts: 2 December 2013
Designation of Rebuttal Experts: 16 December 2013
Fact and Expert Discovery Cutoff: 31 December 2013
Final Pretrial Conference: 11 February 2014 at 2:00 P.M.
Jury Trial: ~~24 February~~ 2014 at 9:30 A.M. and thereafter.
7 April

Stipulation to Continue Trial and Change Related Dates

Boskovich & Appleton 28 North First Street, 6th Floor, San Jose, CA 95113 (408) 286-5150

1 All other dates to remain unchanged.

2 The grounds for this stipulation and order are that fact discovery in this matter was put on
 3 hold pending mediation, which took longer to complete for various logistical reasons. During the
 4 hiatus, it was learned that plaintiff's alleged injuries were much more substantial than originally
 5 believed, and a minimum of 2 expert opinions and independent medical examinations are now
 6 required. Finally, as this Court knows, plaintiff's counsel was involved in the jury trial of *Montiel v.*
 7 *Sheppard, et al.*, case number C07 05490 PSG, which took much more time than expected due to
 8 unforeseen (and unforeseeable) circumstances, and now is set for retrial in the first week of October.

9
 10 Dated: 24 July 2013

11 /s/Anthony Boskovich
 12 By: _____
 13 ANTHONY BOSKOVICH,
 14 Attorney for Plaintiff

15
 16 Dated: 24 July 2013

OFFICE OF THE COUNTY COUNSEL

17 /s/ Mark Bernal
 18 By: _____
 19 Mark Bernal
 20 Attorney for Defendants

21 **It is so ordered:**

22
 23 Dated: July 29, 2013

24 
 25 _____
 26 The Honorable Paul S. Grewal
 27 Magistrate Judge of the United States District Court